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February 6, 2006

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STEVEN A. AUGUSTINO

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Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

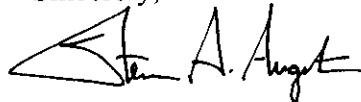
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EB Docket No. 06-36/EB-06-TC-070:
CPNI Certification of Line Systems, Inc. (February 6, 2006)

Dear Ms. Dortch:

On behalf of Line Systems, Inc. ("LSI"), enclosed please find an original and four copies of LSI's 2006 Customer Proprietary Network Information Certification. In accordance with the Enforcement Bureau's public notices DA-06-223 and DA 06-258, LSI submits this Certification for filing in EB Docket No. 06-36 and EB-06-TC-060. If you have any questions regarding this filing, please contact the undersigned at (202) 955-9608.

Sincerely,



Steven A. Augustino

SAA:pab

Enclosures

cc: Byron McCoy, Telecommunications Consumers Division,
Enforcement Bureau, FCC (By Hand)
Best Copy and Printing (By Hand)

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OFFICER CERTIFICATE

I, Mike Miller, Chief Executive Officer of Line Systems Inc. ("LSI") make the following statement in compliance with Section 64.2009(e) of the rules of the Federal Communications Commission ("FCC").

I am an officer of LSI and I have first-hand knowledge of the procedures that LSI has implemented to comply with the FCC's rules pertaining to safeguarding customer proprietary network information ("CPNI"). LSI has adopted the CPNI policy attached hereto as **Attachment A**. All employees and all operations are required to adhere to the attached policy.

I certify that, to the best of my knowledge, this policy is adequate to ensure LSI uses CPNI in compliance with FCC rules.



Mike Miller

Chief Executive Officer
Line Systems Inc.

FOR LINE SYSTEMS, INC.

Date: 2-8-06

CPNI POLICY STATEMENT

These operating procedures of Line Systems, Inc. ("LSI" or "Company") are designed to ensure compliance with the Customer Proprietary Network Information rules applicable to them. Such procedures are as follows.

CPNI Generally

(1) Customer Proprietary Network Information ("CPNI")¹ is:

- Information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by a customer of a telecommunications carrier, and is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and
- Information contained in the bills pertaining to a telephone exchange service or telephone toll service received by a customer of a carrier.²

(2) CPNI includes information such as the type of services that a customer purchases from LSI and information about a customer's use of those services. CPNI does not include information derived from non-telecommunications services offered to the customer.

(3) Under the Act and the FCC's rules, absent customer consent, the Company is permitted to use, disclose, or permit access to CPNI as follows: (a) to provide the telecommunications service "from which the information is being derived;" (b) to provide "services necessary to, or used in, the provision of such telecommunications services, including the publication of directories;" and (c) to market offerings among the categories of service to which the customer already subscribes from the Company (*i.e.* to market another local exchange product to a customer who subscribes to local exchange service).

(4) **It is the LSI's policy not to use CPNI for any activity other than permitted by law.** The customer has a right, and we have a duty, to protect the privacy of CPNI. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the Company. For example, LSI may use CPNI to market services within the same category of services provided. LSI may engage third parties to assist in billing and collections, administration, surveys, marketing, service delivery and customization, maintenance and operations, and fraud prevention. The Company may also disclose CPNI to outside auditors and regulators. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the

¹ See 47 U.S.C. § 222 (establishing the duty of common carriers to protect privacy/proprietary information of customers).

² See 47 U.S.C. § 222(h)(1)(A), (B).

Company will first obtain the customer's consent prior to using CPNI.

(5) LSI maintains CPNI no longer than necessary for its original purpose, unless required to maintain the CPNI for business, legal, or tax purposes. The company keeps records at least as long as required by applicable law. LSI retains records longer than the required minimum period to the extent storage is practicable and cost-effective.

(6) LSI follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or LSI. For example, LSI requires passwords to be entered for customers to access account information through its electronic portals. In addition, sales agents must supply passwords to access the company's sales support and commission tracking information. However, LSI cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. The Company will take any necessary disciplinary action, up to and including termination, for violation of its access policies.

CPNI Use

(1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.

(2) We use, disclose or permit access to CPNI to provide or market service offerings among the categories of service -- local, interexchange and CMRS -- to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we may use the Customer's CPNI to market any services within the categories to which the customer subscribes; but if a Customer subscribes to only one service category, we do not use the customer's CPNI to market other services without the Customer's approval.

(3) We use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval.

(4) Without Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we may use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; (b) conduct, when we provide CMRS, research on the health effects of CMRS; and (c) market, when we provide local service or CMRS, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

(5) We do not use, disclose or permit access to CPNI to identify or track Customers that

call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

CPNI Approvals

- (1) When Customer approval to use, disclose or permit access to Customer CPNI is desired, we may obtain approval through written or oral methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We will honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval, and we will maintain all records of Customer approvals for at least one year.
- (2) Subject to "opt-out" approval requirements, we will use a Customer's individually identifiable CPNI to market communications-related services to that Customer, and we will disclose that CPNI to affiliates that provide communications-related services. We also will allow these to obtain access to such CPNI to market communications-related services.
- (3) If we disclose or allow access to Customers' individually identifiable CPNI to our joint venturers or independent contractors, we will require, in order to safeguard that information, their entry into confidentiality agreements that: (a) require their use of the CPNI only for the purpose of marketing or providing the communications-related services for which the CPNI has been provided; (b) disallow their permitting any other party to use, allow access to, or disclose the CPNI to any other party, unless they are required to make disclosure under force of law; and (c) require that they have in place appropriate protections to ensure the ongoing confidentiality of the CPNI.

CPNI Notice Requirements

- (1) We will individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI along with a solicitation of approval, and we will maintain records of that notification, whether oral or written, for at least one year.
- (2) All notifications will provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. All notifications will: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; and (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.
- (3) All notices will advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and every notice will clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes.

However, we may provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

(4) Our notifications will be comprehensible and not misleading and, if written, will be legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of a notification is in another language, all portions of the notification will be in that language.

(5) We will not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.

(6) For "opt-out" approvals, our notifications will satisfy (1) – (5). We will not use oral notifications except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call.

(7) When we use oral notice for limited, one-time use of CPNI, we will comply with (1) – (5), except that, unless relevant to the particular context for which we intend to use CPNI, we will not: (a) advise Customers who have previously opted out that no action is needed to maintain the "opt-out" election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party; (c) disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to one-time use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.

(8) In addition, for "opt-out" approvals, we will wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and will notify Customers of the applicable waiting period for a response before approval is assumed. For electronic notifications, we will recognize that the waiting period begins to run on the date the notification is sent and, for mail notifications, the 30 days begins to run on the third day following the date the notification was mailed. For e-mail opt-out notices, in addition to other requirements, we will: (a) obtain express, verifiable, prior approval to send notices by e-mail regarding their service in general or their CPNI, in particular; (b) allow Customers to reply directly to e-mails in order to opt-out; (c) use another means of communicating the notice if the e-mail is returned as undeliverable before considering the Customer to have received notice; and (d) ensure that the subject line in the e-mail clearly and accurately identifies the subject matter of the e-mail.

(9) In addition, for "opt-out" approvals, we will provide notices to our customers every two years, and we will make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We

may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

CPNI Safeguards

(1) Before using any CPNI where customer approval is required, LSI personnel are required to provide notification that satisfies the requirements above. Customer approval must be obtained in compliance with the standards in this CPNI policy and all applicable laws. All new contracts with customers must contain a CPNI notification and the customer will be required to choose whether to authorize CPNI access at the time of contracting.

(2) All employees must be trained upon employment as to when they are, and are not, authorized to use CPNI. This training will also outline the Company's disciplinary process in place to deal with failures to adhere to the CPNI policy. All employees will be required to sign an acknowledgement to be kept on file with the Company that he or she understands that unauthorized use of CPNI will carry disciplinary action up to and including termination. Such acknowledgements will be updated every two years.

(3) All Customer Service Representatives must be trained upon employment to proactively ascertain that the customer with whom the Customer Service Representative is conversing is actually the customer on the applicable account prior to dispensing CPNI. Customer Service Representatives are reviewed on a regular basis and additional training is provided as needed based on these reviews.

(4) LSI requires express written authorization from the customer prior to disclosing CPNI to third parties or to new carriers, except as permitted or otherwise required by law. In compliance with state decisions, LSI provides customer service records (CSRs) to carriers based upon the carrier's certification that the customer authorized disclosure. LSI also discloses CPNI to our wholesale suppliers, vendors or third party agents as necessary to provision local exchange or interexchange service to the customer.

(5) Company does not market or otherwise sell CPNI information to any third party.

(6) Access to any account information is password protected and fire walled both on the Sales Agent website and the Customer Support website to ensure that the CPNI is protected from unauthorized disclosure. The Sales Agent Support Team will ensure through password assignment that only LSI Sales Agents will have access to CPNI materials on the website. In order to establish an on-line account with LSI, Customers are required to supply their phone number, and account number to create a password in order to gain access to their CPNI. The phone number must correspond to the account number.

(7) Any sales or marketing campaign that will use CPNI requires the prior approval of CEO and/or the COO. Any approved sales campaign must be recorded in a sales log or similar record. This record must include a description of each campaign, the specific

CPNI that was used in the campaign, and what products and services were offered as part of the campaign. LSI will retain these records for at least one year.

(8) LSI is in the process of implementing a system by which the status of a Customer's CPNI approval can be clearly determined prior to the use of the CPNI. Until such time, any use of CPNI must be verified by reference to the customer contract and customer correspondence file to determine whether the customer has given consent to use CPNI.

(9) On an annual basis, the CEO will review the company's CPNI policies and procedures for compliance with the FCC's rules. The President will certify compliance in accordance with 47 C.F.R. § 64.2009(e).